# UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

JANE DOES 1-9, Case No.: 7:20-CV-00947-DCC

Plaintiffs,

VS.

**COLLINS MURPHY et. al.,** 

Defendants.

JANE DOE, Case No.: 7:21-CV-03193-DCC

Plaintiff,

VS.

**COLLINS MURPHY et. al.,** 

Defendants.

JANE DOE 1 et. al., Case No.: 7:22-CV-03576-DCC

Plaintiffs,

VS.

**COLLINS MURPHY et. al.,** 

Defendants.

# MOTION FOR EXTENSION OF TIME TO SUBMIT JOINT AMENDED SCHEDULING ORDER

Undersigned counsel requests an extension of time to file a joint scheduling order. In its Minute Entry of August 17, 2023, the Court directed the parties to meet and confer on a joint amended scheduling order within thirty (30) days. The parties have conferred and believe that substantial progress has been made, but the number of attorneys involved as well as the issues

presented by the scope of the issues to be addressed, necessitate further discussion to comply with the Court's admonition to come up with something realistically workable. The undersigned believe that an extension of the time for submission to September 25<sup>th</sup>, 2023 will allow sufficient time. Counsel has attempted to contact counsel for all defendants and has heard no objections.

WHEREFORE, the undersigned Parties, respectfully requests this Court grant their Joint Motion and enter an order extending the time in which he may file a joint amended scheduling order to September 25<sup>th</sup>, 2023.

HAVING SEEN AND AGREED:

#### **BELL LEGAL GROUP, LLC**

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280) Joshua M. W. Salley (#13214) 219 North Ridge Street Georgetown, SC 29440 Telephone: (843) 546-2408 jeb@edbelllaw.com

isalley@edbelllaw.com

## DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

Tyler S. Thompson (admitted *Pro Hac Vice*)
Liz J. Shepherd (admitted *Pro Hac Vice*)
Jordan A. Stanton (admitted *Pro Hac Vice*)
13800 Lake Point Circle
Louisville, KY 40223
Telephone: (502) 244-7772
tthompson@kytrial.com
lshepherd@kytrial.com
jstanton@kytrial.com

#### NATIONAL CENTER ON SEXUAL EXPLOITATION

Benjamin Bull (admitted Pro Hac Vic)
Danielle Bianculli Pinter (admitted Pro Hac Vice)
Christen Price (admitted Pro Hac Vice)
Peter Gentala (admitted Pro Hac Vice)
1201 F Street NW

Washington, D.C.20004 bbull@ncose.com dpinter@ncoselaw.org cprice@ncoselaw.org pgentala@ncoselaw.org

## Counsel for Plaintiffs

## WESLEY D. FEW, LLC

/s/Wesley D. Few Wesley D. Few, S.C. Bar No. 15565 P.O. Box 9398 Greenville, South Carolina 29604 864-527-5906 | wes@wesleyfew.com

#### H. COOPER ELLENBERG

Attorney at Law H. Cooper Ellenberg (Admitted Pro Hac Vice) 1401 Doug Baker Blvd., Suite 107 492 Birmingham, Alabama 35242 (205) 908-1790 | cooper.ellenberg@gmail.com

ATTORNEYS FOR PLAINTIFFS JANE DOE 1, JANE DOE 2, JOHN DOE 1 AND JOHN DOE 2 Case No. 7:22-cv-03576-DCC

# TURNER, PADGET, GRAHAM AND LANEY, P.A.

/s/ Mark Goddard

Mark Goddard
J. Kenneth Carter
P.O. Box 1509
Greenville, SC 29602
Telephone: (864) 552-4600
tspeer@turnerpadget.com
kcarter@turnerpadget.com
Counsel for Defendant, MG
Freesites, Ltd.

#### MITCHELL SILBERBERG & KNUPP LLP

Marc E. Mayer | Attorney ID: *pro hac vice* Theresa Bowman | Attorney ID: *pro hac vice* email | mem@msk.com direct | 310-312-3154

2049 Century Park East 18th Floor Los Angeles, California 90067 facsimile | 864-282-5993 Counsel for Defendants

# Metcalfe & Atkinson, LLC

/s/ Hannah Rogers Metcalfe
Hannah Rogers Metcalfe, Fed ID. 9943
Metcalfe & Atkinson, LLC
1395 South Church Street
Greenville, South Carolina 29605
Attorneys for Defendant

## CIAMPA FRAY-WITZER, LLP

Evan Fray-Witzer (pro hac vice ) CIAMPA FRAY-WITZER, LLP 20 Park Plaza, Suite 505 Boston, Massachusetts 02116 Telephone: 617-426-0000 Facsimile: 617-423-4855 Evan@CFWLegal.com

# **BOSTON LAW GROUP, PC**

**Attorneys for Defendant** 

Valentin D. Gurvits (pro hac vice)
Frank Scardino (pro hac vice)
BOSTON LAW GROUP, PC
825 Beacon Street, Suite 20
Newton Centre, Massachusetts 02459
Telephone: 617-928-1804
Facsimile: 617-928-1802

vgurvits@bostonlawgroup.com <u>frank@bostonlawgroup.com</u> **Attorneys for Defendant**